

LATHAM & WATKINS LLP  
Marvin S. Putnam (Bar No. 212839)  
*marvin.putnam@lw.com*  
Laura R. Washington (Bar No. 266775)  
*laura.washington@lw.com*  
10250 Constellation Blvd., Suite 1100  
Los Angeles, California 90067  
Telephone: +1.424.653.5500  
Facsimile: +1.424.653.5501

*Attorneys for Defendants*  
Netflix, Inc., and  
Netflix Worldwide Entertainment, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX  
WORLDWIDE ENTERTAINMENT,  
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**PROOF OF SERVICE**

Hon. R. Gary Klausner

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years. My business address is Latham & Watkins LLP, 10250 Constellation Blvd., Suite 1100, Los Angeles, CA 90067. My email address is aimee.mandel@lw.com.

On **July 29, 2024**, I served the following documents described as:

1. **SEALED DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
2. **SEALED EXHIBIT 1 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
3. **SEALED EXHIBIT 2 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
4. **SEALED EXHIBIT 3 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
5. **SEALED EXHIBIT 4 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
6. **SEALED EXHIBIT 5 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
7. **SEALED EXHIBIT 6 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
8. **SEALED EXHIBIT 7 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
9. **SEALED EXHIBIT 8 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**
10. **SEALED EXHIBIT 9 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE**

11. SEALED EXHIBIT 10 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
12. SEALED EXHIBIT 11 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
13. SEALED EXHIBIT 12 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
14. SEALED EXHIBIT 13 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
15. SEALED EXHIBIT 14 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
16. SEALED EXHIBIT 15 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
17. SEALED EXHIBIT 16 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
18. SEALED EXHIBIT 17 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
19. SEALED EXHIBIT 18 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
20. SEALED EXHIBIT 19 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
21. SEALED EXHIBIT 20 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE
22. SEALED EXHIBIT 21 TO DECLARATION OF RICHARD GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE

- 1           23.   **SEALED EXHIBIT 22 TO DECLARATION OF RICHARD**  
2                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
3                   **TO STRIKE**
- 4           24.   **SEALED EXHIBIT 23 TO DECLARATION OF RICHARD**  
5                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
6                   **TO STRIKE**
- 7           25.   **SEALED EXHIBIT 24 TO DECLARATION OF RICHARD**  
8                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
9                   **TO STRIKE**
- 10          26.   **SEALED EXHIBIT 25 TO DECLARATION OF RICHARD**  
11                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
12                   **TO STRIKE**
- 13          27.   **SEALED EXHIBIT 26 TO DECLARATION OF RICHARD**  
14                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
15                   **TO STRIKE**
- 16          28.   **SEALED EXHIBIT 27 TO DECLARATION OF RICHARD**  
17                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
18                   **TO STRIKE**
- 19          29.   **SEALED EXHIBIT 28 TO DECLARATION OF RICHARD**  
20                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
21                   **TO STRIKE**
- 22          30.   **SEALED EXHIBIT 29 TO DECLARATION OF RICHARD**  
23                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
24                   **TO STRIKE**
- 25          31.   **SEALED EXHIBIT 30 TO DECLARATION OF RICHARD**  
26                   **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
27                   **TO STRIKE**
- 28          32.   **SEALED EXHIBIT 31 TO DECLARATION OF RICHARD**  
                  **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
                  **TO STRIKE**
33.   **SEALED EXHIBIT 32 TO DECLARATION OF RICHARD**  
                  **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
                  **TO STRIKE**
34.   **SEALED EXHIBIT 33 TO DECLARATION OF RICHARD**  
                  **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
                  **TO STRIKE**

- 1        **35. SEALED EXHIBIT 34 TO DECLARATION OF RICHARD**
- 2        **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 3        **TO STRIKE**
- 4        **36. SEALED EXHIBIT 35 TO DECLARATION OF RICHARD**
- 5        **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 6        **TO STRIKE**
- 7        **37. SEALED EXHIBIT 36 TO DECLARATION OF RICHARD**
- 8        **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 9        **TO STRIKE**
- 10       **38. SEALED EXHIBIT 37 TO DECLARATION OF RICHARD**
- 11       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 12       **TO STRIKE**
- 13       **39. SEALED EXHIBIT 38 TO DECLARATION OF RICHARD**
- 14       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 15       **TO STRIKE**
- 16       **40. SEALED EXHIBIT 39 TO DECLARATION OF RICHARD**
- 17       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 18       **TO STRIKE**
- 19       **41. SEALED EXHIBIT 40 TO DECLARATION OF RICHARD**
- 20       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 21       **TO STRIKE**
- 22       **42. SEALED EXHIBIT 41 TO DECLARATION OF RICHARD**
- 23       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 24       **TO STRIKE**
- 25       **43. SEALED EXHIBIT 42 TO DECLARATION OF RICHARD**
- 26       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- 27       **TO STRIKE**
- 28       **44. SEALED EXHIBIT 43 TO DECLARATION OF RICHARD**
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- TO STRIKE**
- 45. SEALED EXHIBIT 44 TO DECLARATION OF RICHARD**
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- TO STRIKE**
- 46. SEALED EXHIBIT 45 TO DECLARATION OF RICHARD**
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**
- TO STRIKE**

- 1        47.    SEALED EXHIBIT 47 TO DECLARATION OF RICHARD
- 2                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 3                TO STRIKE
- 4        48.    SEALED EXHIBIT 48 TO DECLARATION OF RICHARD
- 5                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 6                TO STRIKE
- 7        49.    SEALED EXHIBIT 49 TO DECLARATION OF RICHARD
- 8                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 9                TO STRIKE
- 10       50.    SEALED EXHIBIT 50 TO DECLARATION OF RICHARD
- 11                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 12                TO STRIKE
- 13       51.    SEALED EXHIBIT 51 TO DECLARATION OF RICHARD
- 14                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 15                TO STRIKE
- 16       52.    SEALED EXHIBIT 53 TO DECLARATION OF RICHARD
- 17                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 18                TO STRIKE
- 19       53.    SEALED EXHIBIT 54 TO DECLARATION OF RICHARD
- 20                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 21                TO STRIKE
- 22       54.    SEALED EXHIBIT 55 TO DECLARATION OF RICHARD
- 23                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 24                TO STRIKE
- 25       55.    SEALED EXHIBIT 56 TO DECLARATION OF RICHARD
- 26                GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- 27                TO STRIKE
- 28       56.    SEALED EXHIBIT 57 TO DECLARATION OF RICHARD
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- TO STRIKE
57.    SEALED EXHIBIT 58 TO DECLARATION OF RICHARD
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- TO STRIKE
58.    SEALED EXHIBIT 59 TO DECLARATION OF RICHARD
- GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION
- TO STRIKE

- 1       **59. SEALED EXHIBIT 60 TO DECLARATION OF RICHARD**  
2       **GADD IN SUPPORT OF DEFENDANTS' SPECIAL MOTION**  
3       **TO STRIKE**
- 4       **60. SEALED EXHIBIT 7 TO DECLARATION OF LAURA WRAY**  
5       **IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO**  
6       **STRIKE**
- 7       **61. SEALED DECLARATION OF MARVIN S. PUTNAM IN**  
8       **SUPPORT OF DEFENDANTS' APPLICATION FOR LEAVE**  
9       **TO FILE DOCUMENTS IN SUPPORT OF DEFENDANTS'**  
10       **SPECIAL MOTION TO STRIKE UNDER SEAL**

by serving a true copy of the above-described documents in the following manner:

**BY ELECTRONIC MAIL**

The above-described documents were transmitted via electronic mail to the following party on July 29, 2024:

**LAW OFFICES OF ALLEN  
HYMAN**

Allen Hyman (State Bar No. 73371)  
lawoffah@aol.com  
10737 ½ Riverside Dr.  
N. Hollywood, CA 91602

Attorneys for Plaintiff

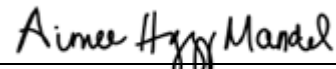
**THE ROTH LAW FIRM, PLLC**

Richard A. Roth (Admitted *Pro Hac Vice*)  
Richard@rrothlaw.com  
Brian Levenson (Admitted *Pro Hac Vice*)  
brian@rrothlaw.com  
295 Madison Ave., Fl.22  
New York, NY, 10017

Attorneys for Plaintiff

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **July 29, 2024**, at Los Angeles, California.



Aimee Hyzy Mandel